

1 RICHARD SEGERBLOM, ESQ.
2 704 South Ninth Street
3 Las Vegas, Nevada 89101
4 Tel: (702) 388-9600

5 Attorney for Plaintiff

RECEIVED
OCT 20 10 31 AM '99
BY [Signature]

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF NEVADA

8 MARK A. ARAGON,

)

9 Plaintiff,

)

10 vs.

)

11 REPUBLIC SILVER STATE
12 DISPOSAL, INC.,

C O M P L A I N T

CV-S-99-1461-PMP-LRL

13 Defendant.

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15 COMES NOW Plaintiff above-named, by and through his
16 attorney RICHARD SEGERBLOM, ESQ., and complains of Defendant
17 as follows:

18 I.

19 This is a civil rights action based upon 42 U.S.C. Section
20 1981 and Title VII of the 1964 Civil Rights Act.

21 II.

22 Plaintiff, a white male, is a resident of Clark County,
23 Nevada, and at all times relevant herein was an employee of
24 the Defendant.

25 III.

26 Defendant is a Nevada corporation doing business in Clark
27 County, Nevada, and at all times relevant was Plaintiff's
28 employer.

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IV.

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Plaintiff was hired by Defendant on or about September 14,
1998.

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On October 30, 1998, Plaintiff was laid off because of his race, white. Less senior and less qualified non-white employees were treated more favorably than Plaintiff. As a direct result of the Defendant's discriminatory treatment, Plaintiff has suffered financial loss, physical injuries and emotional distress resulting from those physical injuries.

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VII.

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Plaintiff filed a Charge of Discrimination with the Nevada Equal Rights Commission and has received a Right to Sue letter from the Equal Employment Opportunity Commission, and this complaint is being filed within ninety (90) days of that determination.

WHEREFORE, Plaintiff prays for the following relief:

1. Reinstatement, with full backpay, benefits, seniority, and prejudgment interest;
2. Front pay, if reinstatement is not feasible;
3. Compensatory damages in the amount of \$300,000;
4. Punitive damages in the amount of \$300,000;
5. Attorney's fees and costs of suit; and

1 6. Such other and further relief as the Court may wish
2 to entertain.

3 DATED this 18 day of October, 1999.

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RICHARD SEGERBLOM, ESQ.
704 South Ninth Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

EQUAL EMPLOYMENT OPPORTUNITY COM. ON

NOTICE OF RIGHT TO SUE

(Issued on request)

To: Mark A Aragon
714 WILLIAMS
NORTH LAS VE. NV 89030

From:
EQUAL EMPLOYMENT OPPORTUNITY COMM.
Equal Employment Opportunity Comm.
255 East Temple Street 4th floor
Los Angeles CA 90012

On behalf of a person aggrieved whose identity is CONFIDENTIAL
(29 C.F.R. 1601.7(u))

Charge Number	EEOC Representative	Telephone Number
34B990584	Legal Officer Of The Day	(213) 894-1000

(See the additional information attached to this form)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA): This is your Notice of Right to Sue. It is issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA must be filed in federal court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

- More than 180 days have passed since the filing of this charge.
- Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of the charge.
- The EEOC is terminating its processing of this charge.
- The EEOC will continue to process this charge.

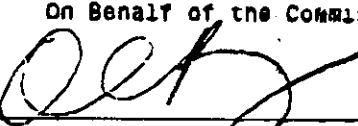
Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.
- The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of your charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required). EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On Behalf of the Commission


 Olophius Perry, Acting Director

August 4, 1999

(Date)

Enclosure(s)

cc: Executive Officer
SILVER STATE DISPOSAL
315 W. CHEYENNE AVE.
NORTH LAS VE. NV 89030